

Reply to the § 102(e) Rejections

Applicant previously cancelled claims 5-8 and 10 without prejudice. Nevertheless, the Office action has rejected claims 5, 6 and 10 under § 102(e) as anticipated by deSilva. Because claims 5, 6 and 10 are no longer pending in this case, applicant respectfully submits that the § 102(e) rejections are moot.

Reply to the § 103 Rejections

Claims 1-4, 7-9 and 11 have been rejected under 35 U.S.C. § 103(a) as obvious over deSilva in view of Andrews. Applicant previously cancelled claims 7-8 without prejudice. Because claims 7 and 8 are no longer pending in this case, applicant respectfully submits that the § 103(a) rejections of these claims are moot.

Amended independent claim 1 recites a development environment for producing a PostScript Printer Description (“PPD”) text file, the development environment comprising a base PPD text file that comprises information regarding a printer, the information including text in a first language, and a PPD generator adapted to import the base PPD text file and to generate therefrom a second PPD text file that includes text translated from the first language to a second language. Amended independent claims 3 and 4 recite methods for generating or revising a PPD text file, the methods comprising providing a base PPD text file that comprises information regarding a printer, the information including text in a first language, the base PPD text file adapted for a first software platform, providing a build file that comprises information as to how the base PPD text file should be edited to provide a second PPD text file that includes text translated from the first language to a second language, and implementing the build file to generate the second PPD text file. Neither deSilva nor Andrews, alone or combined, describe or suggest the claimed invention.

Although deSilva includes a brief discussion of the use of information in a PPD file, deSilva does not describe or suggest anything else related to the claimed invention. First, deSilva does not describe or suggest a development environment for producing a PPD text file, or methods for generating or revising a PPD text file. deSilva nowhere describes or suggest methods or apparatus for producing such files, and the Office action does not identify any such reference. Additionally, deSilva does not describe or suggest providing a development environment that includes a base PPD text

file that comprises information regarding a printer, the information including text in a first language, the base PPD text file adapted for a first software platform.

Moreover, as the Office action expressly concedes, deSilva does not describe or suggest a PPD generator adapted to import the base PPD text file and to generate therefrom a second PPD text file that includes text translated from the first language to a second language. Further, as the Office action concedes, deSilva does not describe or suggest methods for generating or revising a PPD text file, the methods comprising providing a build file that comprises information as to how the base PPD text file should be edited to provide a second PPD text file that includes text translated from the first language to a second language. Indeed, deSilva contains no discussion or suggestion related to any type of file that includes information as to how a base PPD text file should be edited to provide a second PPD text file that includes text translated from a first language to a second language.

Instead, deSilva describes an imaging system that provides a facility for converting complex graphical primitives that cannot be directly imaged by a page description language (“PDL”), such as PostScript, into a plurality of less complex graphical primitives that can be directly imaged by the PDL. (Abstract). The system includes a printer handler, which is “a type of printer driver that controls and drives a specific printer; its purpose is to convert textual and graphical objects into printer readable form for any particular printer type.” (Col. 10, lines 42-45). The handler “reads” the printer’s “personality document” to access personality objects, such as the printer configuration and resolution, print job description, and the print device object that converts graphic data into the printer’s imaging model. (Col. 12, lines 36-51). A personality document “is created for each type of printer that a printer handler is created for.” (Col. 13, lines 28-29). By way of example, deSilva lists selected entries from a PPD file to illustrate features of the PPD that can be used to determine attributes of a PostScript printer. (Col. 18, line 29 through Col. 19, line 5).

Ignoring these differences, the Office action selectively excises individual words or phrases from deSilva to reconstruct elements of the claimed invention. Indeed, the Office action first selectively excises the words “developer,” “PostScript,” and “PPD,” that appear randomly throughout deSilva as evidence that deSilva describes a development environment for producing a PPD text file associated with a printer.

Applicant respectfully submits that the a claim is not rendered obvious simply because the claim language includes some of the same words and phrases scattered throughout the text of a reference.

Moreover, deSilva uses the selected words and phrases in a completely unrelated context to that of the claimed invention. The Office action cites col.12, line 48 and col. 13, lines 29-32 for the word “developer.” Read in its proper context, both references pertain to a printer manufacturer that “develops” (i.e., manufactures) a printer. (Col. 12, lines 37-49; col. 13, lines 28-32). Neither reference to the word “developer” pertains in any way to the claimed invention, i.e., a development environment for producing a PPD text file. Next, the Office action cites col. 18, line 32 for the word “PPD.” Read in its proper context, this reference states that features of a PPD “can be used to determine a PostScript printer’s attributes.” (Col. 18, lines 30-33). Once again, this reference does not pertain in any way to a development environment for producing a PPD text file.

After conceding that deSilva does not describe or suggest the claimed invention, the Office action nevertheless cites Andrew “in the same area of developing computer programs for computers to execute.” Applicant respectfully disagrees that deSilva is related to “developing computer programs for computers to execute,” and the Office action has not provided any support such an assertion. In contrast, as described above, deSilva pertains to an imaging system that provides a facility for converting complex graphical primitives that cannot be directly imaged by a PDL into a plurality of less complex graphical primitives that can be directly imaged by the PDL.

Unlike deSilva, Andrews describes methods and apparatus for automatically translating software source code from one high-level programming language to source code in another high-level programming language. (Col. 2, lines 56-59; Col. 4, lines 13-18). In particular, Andrews describes the “Rosetta Translator,” that translates software source code from “portable Transaction Application Language (pTAL) to C++.” (Col. 4, lines 18-22). Andrews does not, however, describe anything related to PPD text files, or a PPD generator adapted to import a base PPD text file and to generate therefrom a second PPD text file that includes text translated from the first language to a second language. Indeed, Andrews does not describe or suggest anything relevant to the claimed invention.

Nevertheless, using hindsight gleaned from applicant's invention, the Office action attempts to cobble together the claimed invention by combining the two disparate references. Applicant respectfully submits that such hindsight reconstruction is impermissible. Absent such hindsight, the Office action provides no credible support for selectively excising various bits and pieces of the two disparate references to arrive at the claimed invention.

Further, the Office action fails to provide any citation or support in the references themselves that show a motivation to combine deSilva and Andrews. Applicant respectfully submits that there is no such support, and that there also is no conceivable reason why a person of ordinary skill in the art would somehow be motivated to combine these unrelated references. deSilva is concerned with an object-oriented printing interface, and Andrews relates to high-level software source code language conversion. Nothing in either reference would motivate a person of ordinary skill in the art to somehow combine the references. Further, even if there were some suggestion or motivation to combine deSilva with Andrews, it is unclear how the two references could be combined to produce anything that would be useful for any purpose.

In response to applicant's previous arguments, the Office action at 12 states that "one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references." Applicant has not "attacked references individually," but instead has described how neither cited reference, alone or combined, describes or suggests the claimed invention. The Office action has cited two references that are so unrelated that nothing meaningful could result from combining the two references.

Further, the Office action at 14 states that "the examiner recognizes that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art." After correctly stating this principle, the Office action nevertheless summarily concludes, with no support, that "the motivation is combined [sic] is found in the reference [sic]." Indeed, the Office action at 15 simply asserts that it would have been obvious "to have modified the PPD files developing method of deSilva by the teaching of Andrew because . . . it would save time

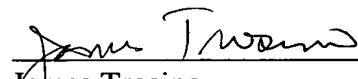
and effort for the PPD file developer by avoiding rewriting complex and difficult programs in multiple languages to run on multiple brands of computers.” This assertion does not identify any teaching, suggestion or motivation in the references themselves to modify or combine the references. Applicant respectfully submits that such a conclusory statement, unsupported by any evidence in the references, is impermissible, and fails to establish any teaching, suggestion, or motivation to combine the references.

Because the cited references, alone or combined, do not describe or suggest the claimed invention, applicant respectfully requests that the Examiner withdraw the rejections of claims 1, 3 and 4. Because claims 2, 9 and 11 depend from claim 1, applicant respectfully requests that the Examiner withdraw the rejections of claims 2, 9 and 11.

Conclusion

For the reasons stated above, applicant submits that this application, including claims 1-4, 9 and 11, is allowable. Applicant therefore respectfully requests that the Examiner reconsider and allow this application.

Respectfully submitted,


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